

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

Civil Action No. 4:22-cv-00249-ALM

DIVYA GADASALLI, an individual,
Plaintiff,

v.

JERRY BULASA, an individual;
DONG LIAN, an individual; DANYUN LIN, an individual;
TD BANK, N.A., a national banking association;
ABACUS FEDERAL SAVINGS BANK, a federal savings bank;
BINANCE HOLDINGS, LTD. d/b/a Binance, a foreign company; and
POLONIEX, LLC, a Delaware limited liability company;
Defendants.

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PLAINTIFF'S MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff DIVYA GADASALLI, an individual ("Plaintiff"), by and through undersigned counsel, pursuant to Fed.R.Civ.P. 7 and Local Civil Rules CV-7, hereby requests entry of a Protective Order to facilitate the exchange of documents and information in discovery in this action. In support hereof, Plaintiff alleges as follows:

During the course of discovery in this action, it may be necessary for the parties or third parties to disclose certain categories of confidential information relating to the subject matter of this action. Protection of the confidential information is necessary because it is likely that such documents will contain confidential personal information, financial information, and/or proprietary business, technical, or trade secret information of the parties.

Undersigned counsel for Plaintiff has discussed with counsel for the defendants the advisability and desire to have appropriate protections in place for confidential information before any documents or information is exchanged. **Defendants TD BANK, N.A. and ABACUS**

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FEDERAL SAVINGS BANK have represented that they have no objection to entry of the standard model Protective Order used by this Court -- a copy of which is filed herewith. Defendant BINANCE HOLDINGS, LTD. has represented that it opposes entry of any Protective Order on the grounds that BINANCE believes it is premature and that BINANCE has a pending motion contesting personal jurisdiction.

For the foregoing reasons, Plaintiff DIVYA GADASALLI, respectfully moves this Honorable Court for entry of the Protective Order submitted herewith and for all such other relief which the Court deems just and proper.

Respectfully submitted,

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By: /s/ David C. Silver

DAVID C. SILVER

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE CV-7(h)

In accordance with Rule CV-7(h) of the Local Rules of the United States District Court - Eastern District of Texas, the undersigned counsel for Plaintiff certifies that in good faith, before filing this motion, he communicated with counsel for each defendant who has made an appearance in this case. Defendants TD BANK, N.A. and ABACUS BANK have each represented to the undersigned that they have no objection to the relief requested herein. Defendant BINANCE HOLDINGS, LTD. represented that it opposes entry of any Protective Order on the grounds that BINANCE believes it is premature and that BINANCE has a pending motion contending that the Court lacks personal jurisdiction over BINANCE.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was electronically filed with the Clerk of Court on this 29th day of April 2022 by using the CM/ECF system and that a true and correct copy will be served via electronic mail to: **ALLISON CARROLL, ESQ.**, DUANE MORRIS, LLP, *Counsel for Defendant TD Bank, N.A.*, 100 Crescent Ct. - Suite 200, Dallas, TX 75201, E-mail: ACarroll@DuaneMorris.com; **AMANDA L. COTTRELL, ESQ.**, SHEPPARD MULLIN, *Counsel for Defendant Abacus Federal Savings Bank*, 2200 Ross Avenue - 20th Floor, Dallas, TX 75201, E-mail: ACottrell@SheppardMullin.com; **RYAN SQUIRES, ESQ.**, SCOTT DOUGLASS MCCONNICO LLP, *Counsel for Binance Holdings, Ltd.*, 303 Colorado Street - Suite 2400, Austin, TX 78701, E-mail: rsquires@scottdoug.com; and **KAREN R. KING, ESQ.**, MORVILLO ABRAMOWITZ GRAND IASON & ANELLO, P.C., *Counsel for Binance Holdings, Ltd.*, 565 Fifth Avenue, New York, NY 10017, E-mail: kking@maglaw.com.

/s/ David C. Silver

DAVID C. SILVER